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April 15, 2016

Thomas S. Berkman
Deputy Commissioner and General Counsel
NYS Department of Environmental Conservation
625 Broadway
Albany, NY 12233-1500

RE: Taconic

Dear Mr. Berkman,

I have enclosed Taconic's response to your February 29, 2016 information request. Given the scope of the government's questions we agreed the Company would produce an initial response by April 15th with the balance provided by May 2nd. However, in an effort to facilitate approval of the Brownfield Cleanup Program application, we thought that it would be desirable to accelerate production of information. Thus, all information sought is enclosed. The information is included on the attached disc. We have provided two copies of the disc. Please let me know if you would like additional information.

Very truly yours,

Scott Fein

Enclosures

Taconic Information Demand

Item 1. *A description of Tonoga, Inc. dba Taconic's affiliation to the facility on 136 Coonbrook Rd. in Petersburgh, NY (the "Facility"), including the manner in which the Tonoga, Inc. dba Taconic owned and operated the. Facility. This should include all deeds, abstracts of title, and real estate transfer documents related to the Facility.*

Tonoga, Inc. (the "Company") owns and operates its facilities on Coonbrook Road in Petersburgh, NY. The site consists of 9 structures, 3 parking lots and a propane storage facility. The site is home to the Company's offices, warehouse and manufacturing operations.

123 Coonbrook Road consists of a propane storage facility; 125 Coonbrook Road (referred to as "Building 3") consists of a wood shop; 127 Coonbrook Road (referred to as "Building 1") consists of offices, manufacturing and warehousing. Property transfer dates related to these parcels are as follows:

- July 15, 1969 From Lester & Virginia Russell (Former officers of Taconic Properties, now deceased) to Taconic Properties;
- November 7, 1979 From Taconic Properties to Taconic Plastics, Inc.;
- June 30, 1981 From Taconic Plastics, Inc. to Taconic Plastics Limited.;
- March 19, 1991 From Taconic Plastics Limited. to Tonoga Limited;
- February 12, 2002 From Tonoga Limited to Tonoga, Inc. (current owner)

Each of the foregoing business entities are inactive predecessors of Tonoga, Inc.

136 Coonbrook Road (referred to as "Buildings 2, 4 & 5") consists of offices, manufacturing and warehousing; 98 Coonbrook Road (referred to as "Buildings 6, 9, 10 & 11") consists of offices, manufacturing and warehousing. Property transfer dates related to these parcels are as follows:

- November 7, 1979 From Henry & Hilda Allen (No relationship to the Company, now deceased) to Taconic Plastics, Inc.;
- June 30, 1981 From Taconic Plastics Inc. to Taconic Plastics Limited.;
- March 19, 1991 From Taconic Plastics Limited. to Tonoga Limited;
- February 12, 2002 From Tonoga Limited to Tonoga, Inc.

Each of the foregoing business entities are inactive predecessors of Tonoga, Inc.

46 Coonbrook Road (referred to as "Barn & Maintenance Warehouse") consists of warehousing; Property transfer dates related to this parcel are as follows:

- November 8, 1993 From Thomas J and Patricia A Singleton to Tonoga Limited
- February 12, 2002 From Tonoga Limited to Tonoga, Inc.

Tonoga Limited is an inactive predecessor of Tonoga, Inc.

Responsive documents are enclosed and numbered 004575 through 004598.

Item 2. *Identify if Perfluorooctanoic Acid (PFOA), polytetrafluorethylene (PTFE), or its constituents, or other hazardous waste were stored, used, processed, manufactured, managed, released or otherwise present (hereinafter collectively referred to as "handled") and state the time period during which each waste was handled at the Facility.*

Taconic has, since 1961, manufactured PTFE coated fabrics. PTFE historically contained approximately 1% PFOA as a processing agent (since 2013 PTFE used by Taconic no longer contained PFOA). At the facility, PTFE is mixed with water supplied by the plant wells, and additives, such as ammonia, formic acid, surfactants, and pigments. The PTFE mixture is then pumped into long shallow dip pans at the base of each surface coating oven. Raw fiberglass fabric is unrolled and pulled into the dip pan. As the PTFE mixture coats the fiberglass, the fiberglass is pulled vertically up through the surface coating oven, where it is dried, baked, and then sintered. The coated fiberglass is re-rolled back from the top of the oven and the process is repeated multiple times to place multiple coats of the PTFE mixture on the fiberglass.

PFOA was historically used by fluoropolymer manufacturers as a dispersion agent in the manufacture of fluoropolymers, such as PTFE. Since 2006, fluoropolymer manufacturers have participated in EPA's PFOA Stewardship Program, where manufacturers phased-out PFOA in PTFE, and eventually eliminated PFOA in PTFE in 2013. Taconic has not used PFOA since 2013.

Taconic is not and never has been a fluoropolymer manufacturer or a manufacturer of PFOA or PTFE. Taconic purchases PTFE from fluoropolymer manufacturers, and then uses PTFE as a raw material to produce articles at the Petersburgh facility. Articles produced by Taconic do not contain PFOA.

It bears note that at all times during which PFOA was used at the facility or may have been present in discharges at the facility, PFOA and PTFE were not classified as hazardous substances or hazardous wastes under State or Federal Law. Neither PFOA nor PTFE are classified as hazardous substances or hazardous wastes under Federal Law today. In January 2016, approximately three years after Taconic ceased using PTFE containing PFOA, New York State classified PFOA as a hazardous substance.

With respect to potential releases, from at least 1989 through 2003, the Company held a DEC issued SPDES Permit, which authorized process waste water discharges to Outfall 001, as described in and depicted on the maps contained in the SPDES Permit referenced below and enclosed. In approximately 1999, the Company ceased discharging process water. In 2001, the Company transitioned to General Permit coverage for its sanitary discharges. The permitted process water discharges may have contained PFOA. The SPDES permit authorizing the discharge of process water is referenced below and enclosed. Also note that spill reports provided in response to Item 8 evidence other releases.

The SPDES Permit, as amended and extended is enclosed and numbered 000098 through 000131:

- NYSDEC SPDES Permit No. NY-0223107, valid May 15, 1989 through May 15, 1994. (Numbered 000122 - 000130)

- NYSDEC SPDES Permit No. NY-0223107, renewed for a term commencing May 15, 1994 and ending May 15, 1999. (Numbered 000117 - 000121) as modified on December 15, 1997 to include an additional sanitary wastewater outfall. (Numbered 000100 - 000116).

- NYSDEC SPDES Permit No. NY-0223107, renewed for a term commencing November 1, 1998 and ending November 1, 2003. (Numbered 000098-000099)

Item 3. *If PTFE, its constituents or hazardous wastes at the Facility were collected in drums, tanks, settling pits or other units, please provide details regarding these units, including their location, periods of use, whether there were releases from these units, and how such releases were managed and/or remediated.*

Please see enclosed Supplemental Environmental Investigation Report ("SEIR"), prepared by Clough, Harbour & Associates and submitted to DEC on April 12, 2001 (Numbered 000001 through 0000050). By letter dated May 15, 2001 DEC approved closure of a dry well on site and the clean out of a hydraulic pit associated with Building 2, along with the installation of a monitoring well (MW-1) to monitor VOCs and TPH on a semi-annual basis. Figures included in the SEIR depict facility layout, the location of outfalls and the location of waste water USTs. The SEIR did not contemplate PFOA, as it was neither a hazardous waste or substance and was not otherwise regulated. DEC approved the SEIR.

On June 27, 2007, after four years of "below detection limit" levels of VOCs and TPH's, DEC found that sampling could be discontinued at MW #1 and MW # 4. Please see DEC's letter and related documents. (Numbered 000051-000083). Note that the January 2001 Engineering Report of Wastewater Operations includes a description of the process wastewater discharged through Outfall 001 (See pages numbered 000076 and 000077).

Item 4. *Provide a map marked with the location of any and all areas where PTFE, its constituents or hazardous wastes were stored long-term, including disposal areas, and state when each such disposal location was used for this purpose, and identify indicate whether the disposal area has a liner, groundwater monitoring or other protective safeguards. Please provide any groundwater monitoring data and analytical reports associated with the disposal areas.*

The permit, reports and supporting materials provided in response to Items 2 and 3 above contain responsive materials. Groundwater monitoring data is contained in the reports provided in response to Item 7 below.

Item 5. *All documents, including manifests, relating to the transportation and disposal of hazardous wastes, including PFOA, PTFE and/or other hazardous substances to and from the Facility.*

Again, it bears note that at all times during which PFOA was used at the facility or may have been present in discharges at the facility, PFOA and PTFE were not classified as hazardous substances or hazardous wastes under State or Federal Law. Neither PFOA nor PTFE are classified as hazardous substances or hazardous wastes under Federal Law today. In January

2016, approximately three years after Taconic ceased using PTFE containing PFOA, New York State classified PFOA as a hazardous substance.

We located the following responsive documents:

- Hazardous waste manifests, 1989 to present. (Numbered 000764-002239)
- Non-Hazardous waste manifests, 1996 to present. (Numbered 002240 -003987)

Item 6. *The names of all employees who were involved with and/or responsible for the treatment, storage and disposal of hazardous substances at the Facility.*

All Taconic employees are involved with and are responsible for complying with laws governing the proper storage and disposal of hazardous substances. The following employees have signed hazardous waste manifests on behalf of Taconic:

- Karen Toth, Environmental Manager, October 2012 to Present.
- Joel Shorter, Safety/Environmental Engineer, October 1997 to July 2013.
- Andrew Kawczak, Environmental Manager, April 2001 to June 2012.
- Harvey Teal, Facilities Manager, 1986 to October 2005.
- John Carelli, Maintenance Manager, August 1989 to November 2003.
- Laura Burzesi, Facilities Engineer, July 1996 to September 1998.
- Phillip Steinhauser, Facilities Engineer, July 1993 to June 1996.

Item 7. *Provide a map which shows all monitoring wells installed at or near the Facility. In addition, state the purpose for which each well was or is being used and, to the extent not already provided in response to the above questions, provide the analytical results obtained from all monitoring conducted at each of the wells.*

Please see the materials provided in response to Item 3 above for location maps.

Plant Water Supply Wells

- Buildings 2/4; Well #1 (362 feet deep, active, unknown when dug)
- Buildings 4/5; Well #2 (400 feet deep, active, unknown when dug)
- Buildings 6/9/10/11; Well #3 (60 feet deep active, dug in 1997)
- Northwest of Building 6; Well #3a (was dug in 1997, failed pump test due to low gpm, was immediately closed and sealed, never used as a water source)

Analytical Results:

- January 2013 (Numbered 000132-000299)
- February 2006 (Numbered 000300-000365)
- January 2006 (Numbered 000366-000420)
- January 2005 (Numbered 000542-000642)
- December 2004 (Numbered 000643-000759)

Plant Monitoring Wells

All have been closed and covered. See the materials provided in response to Item 3 above for installation and closure information.

- Between Buildings 2 and 4; Monitoring Well #1 (13.0 feet deep)
- Between Buildings 2 and 5; Monitoring Well #2 (12.5 feet deep)
- Southwest of Building 4; Monitoring Well #3 (12.6 feet deep)
- East of Building 4; Monitoring Well #4 (12.1 feet deep)

Analytical Results:

- October 2005; (Numbered 000421-000541)
- Materials provided in response to Item 3 above.

Item 8. *Describe all leaks, spills, or other releases of a hazardous waste or pollutant or contaminant (including but not limited to PFOA or PFTE) at or from the Facility. Your response should include but not be limited to the following information as to each such occurrence:*

a. The date of the occurrence;
b. The specific location of the occurrence (indicate on a map);
c. The quantity of material leaked, spilled or released;
d. Steps taken to remediate or stop the release;
e. The specific hazardous substance, pollutant or contaminant that was involved, including the nature and composition of the material, and the physical state (solid, liquid, gas, etc.) of such material; and
f. *A copy of all documentation relating to the release.*

Again, it bears note that at all times during which PFOA was used at the facility or may have been present in discharges at the facility, PFOA and PTFE were not classified as hazardous substances or hazardous wastes under State or Federal Law. Neither PFOA nor PTFE are classified as hazardous substances or hazardous wastes under Federal Law today. In January 2016, approximately three years after Taconic ceased using PTFE containing PFOA, New York State classified PFOA as a hazardous substance.

Responsive Documents:

- DEC Spills Report Database; 1989 to present. Releases reported in the database were subject to NYSDEC reporting requirements. (Numbered 004557-004574)

- Taconic Spill Reports and supporting documents, 1996 to present. (Numbered 3988-4556). The majority of the releases were not reportable because they were released indoors, were below the reportable quantity, or did not otherwise enter the environment.

Item 9. *Explain how all Facility process water and wastewater is handled, discharged and/or disposed.*

Process Water

Process water, as well as the main water supply for the plant, is supplied by the following;

- Buildings 2/4; Well #1 (362 feet deep)
- Buildings 4/5; Well #2 (400 feet deep)
- Buildings 6/9/10/11; Well #3 (60 feet deep)
- Building 1; Russell Road Surface Water Pond

Process Wastewater

Taconic has, since 1961, manufactured PTFE coated fabrics. PTFE historically contained approximately 1% PFOA as a processing agent (since 2013 PTFE used by Taconic no longer contained PFOA). At the facility, PTFE is mixed with water supplied by the plant wells, and additives, such as ammonia, formic acid, surfactants, and pigments. The PTFE mixture is then pumped into long shallow dip pans at the base of each surface coating oven. Raw fiberglass fabric is unrolled and pulled into the dip pan. As the PTFE mixture coats the fiberglass, the fiberglass is pulled vertically up through the surface coating oven, where it is dried, baked, and then sintered. The coated fiberglass is re-rolled back from the top of the oven and the process is repeated multiple times to place multiple coats of the PTFE mixture on the fiberglass.

After the completion of a PTFE mixture run, mixtures left over in the dip pans are pumped into drums and sent offsite as non-hazardous waste.

Wastewater from the PTFE surface coating oven process is primarily generated by the rinsing of the dip pans with spray water hoses, supplied by the plant wells, after residual mixtures have been pumped into drums for offsite disposal. In addition, wastewater is generated from the rinsing of pails and pans with spray water hoses, supplied by the plant wells, done in industrial and laboratory sinks. Lastly, wastewater is also generated from the mopping of the production floors in the surface coating oven manufacturing areas.

Wastewater generated from Oven Rooms 4 and 5, and the laboratory sinks is pumped directly into the onsite Wastewater Treatment Plant (WWTP) storage tank located in Oven Room 4. Wastewater generated from Oven Room 6 is pumped into an underground storage tank inside the oven room. Wastewater generated from Oven Room 11 is pumped into an aboveground storage tank inside the oven room. Wastewater from Oven Rooms 6 and 11 is then pumped into a small tank truck and is transported to Building 4. Wastewater is unloaded outside of Building 4 and pumped into the WWTP storage tank located inside Oven Room 4.

Wastewater effluent from the onsite WWTP is pumped into a receiving tank located in Oven Room 4. From this tank, the wastewater is pumped directly to the air pollution control device for Oven Rooms 4 and 5, Fume Eliminator #5, where it is used as the water curtain inside the fume eliminator inlet chamber. The water is recycled inside the fume eliminator.

The fume eliminator is cleaned out on a regular basis. Liquid and solid wastes are pumped out of the fume eliminator sump by a 3rd party vacuum truck and disposed offsite as non-hazardous waste.

Item 10. *Identify the locations of all septic systems currently or formerly used by the Facility, including leach fields, the dates of use and the materials discharged into such system.*

Please see the SPDES Permit provided in response to Item 2 above and the CHA Reports provided in response to Item 3 above. Please also see the facility's General Permit (Numbered 000084 – 000097.

Item 11. *Describe the corporate or legal relationship between Tonoga, Inc. dba Taconic, Tonoga Limited, Tonoga Brazil, and any other affiliated corporate entity related to the operations at the Facility. In addition, please provide a chronology showing the acquisitions, mergers, or dissolutions involving these companies.*

Tonoga, Inc. d/b/a Taconic (the "Company") is a Delaware corporation. The Company is a successor in interest to Tonoga Limited, a Republic of Ireland corporation, which is a successor in interest to Taconic Plastics Limited, a United Kingdom corporation, which is a successor in interest to Taconic Plastics Inc., a New York corporation. The Company's history is summarized as follows:

- 1969 - Taconic Plastics Inc. was founded (incorporated in New York)
- 1981 - Taconic Plastics Limited d/b/a Taconic Plastics was incorporated in United Kingdom ("Taconic UK"). Taconic UK purchased all of the assets and assumed all of the liabilities of Taconic Plastics Inc. Taconic Plastics Inc. was subsequently liquidated.
- 1991 - Tonoga Limited d/b/a Taconic Plastics was incorporated in the Republic of Ireland ("Taconic Ireland"). Taconic Ireland acquired all of the assets and assumed all of the liabilities of Taconic UK. Taconic UK was subsequently liquidated.
- 2002 - Tonoga, Inc. d/b/a Taconic (the Company) was incorporated in Delaware. The Company acquired all of the assets and assumed all of the liabilities of Taconic Ireland. Taconic Ireland was subsequently liquidated.

Tonoga Brazil Holdings LLC ("Tonoga Brazil") is a Delaware limited liability company that is wholly-owned by the Company. Tonoga Brazil is a holding company that owns all of the stock of a company that operates in Brazil. The activities of Tonoga Brazil and its subsidiary are not related in any way to the operation of the facility.

Item 12. *Describe when Tonoga, Inc. dba Taconic first discovered that PFOA, PTFE, or its constituents were potentially hazardous or toxic, and provide any and all documents related to such discovery.*

In 2003, Taconic learned that EPA had expressed concern about PFOA. At the time, EPA said there was insufficient scientific evidence to recommend consumers stop using products made with PFOA. Thus, EPA chose not to regulate the compound or provide exposure limits. Despite

EPA's failure to do so, Taconic implemented a new worker safety training initiative to ensure proper handling of PTFE containing PFOA.

In late 2004 and 2005, Taconic performed groundwater sampling. Results reflected the presence of PFOA in the groundwater and in the immediate vicinity of the facility.

The Company provided the sampling results to the New York State Department of Environmental Conservation and the New York State Department of Health and requested guidance. The agencies did not respond. Separately, the Company submitted an application to the Rensselaer County Dept. of Health to install granular activated carbon systems to its on-site wells, which was granted. The State agencies currently maintain they did not respond because PFOA was an unregulated compound and no action need be taken. Although there was no regulatory response, Taconic installed carbon filters at the facility and made bottled water available to employees and Company owned homes adjacent to the facility.

On January 27, 2016, NYSDEC issued a regulation classifying PFOA as a hazardous substance. The following day, EPA issued a new, lower recommended PFOA exposure guidance level. In light of these developments, on the following day Taconic re-notified the NYSDEC of its earlier sampling results and advised NYSDEC that it intended to conduct additional sampling. NYSDEC, NYSDOH and the Rensselaer County DOH have conducted sampling and found that PFOA is present in site groundwater, the municipal water supply (at levels less than the EPA's guidance) and a number of residential wells in the vicinity of the facility. The Company (i) has voluntarily agreed to implement additional safeguards including for impacted residences the provision of bottled water and if PFOA is above a certain threshold, carbon filters; (ii) has voluntarily agreed to design and install a temporary carbon filtration system for the municipal water supply and (iii) has applied for entry into New York State's Brownfield Cleanup Program.

Item 13. *Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Demand. In addition, state whether this person has personal knowledge of the information in the answers provided.*

Responses were compiled by Lawrence Carroll, EVP/CFO, Karen Toth, Environmental Manager and Sharon Goodermote, VP of Administration. Inquiries can be directed to the Company's counsel, Scott Fein at 487-7729.